

Message

From: Bohning, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C00BDC10CA564AE982AA105D4C1B32C5-SBOHNING]
Sent: 5/10/2019 6:10:49 PM
To: Jeremy Avise <jeremy.avise@arb.ca.gov> [jeremy.avise@arb.ca.gov]
Subject: FW: SJV NNSR precursor demo comments

Jeremy –
This is just an FYI.

SJV District had given public notice for 4/15 about changes to NSR rules, including NNSR Precursor Demonstration.
[Rule 2201, Rule 2301, Rule 2520 Public Workshop \(Revised Date\)](#)
But at EPA felt we all had not fully closed the loop on what we wanted in the NNSR P.D.

As a result of a recent conversation between Dave Warner (Dep. APCO) and Meredith Kurpius (EPA R9 Asst. Div. Dir.) & Gerardo Rios (Chief, EPA R9 Permits Office), we had a call 5/9 with OAQPS and SJV District in which we relayed our concerns, mainly asking for expanded narrative on some issues. The email below is a follow-up to that call.

The SJV District is/was planning to take their revised NSR rules and their NNSR Precursor Demonstration to SJV Board in June, and will need to start setting up public notice about it imminently. With our latest comments, there is a time crunch on the District (& I think mainly on Leland). There is a possibility they would postpone taking it to the Board by a month.

- Scott B.

From: Bohning, Scott
Sent: Friday, May 10, 2019 10:26 AM
To: "Leland Villalvazo" <Leland.Villalvazo@valleyair.org> <Leland.Villalvazo@valleyair.org>; Errol Villegas <errol.villegas@valleyair.org>; Arnaud Marjollet <Arnaud.Marjollet@valleyair.org>; "Dave Warner" <dave.warner@valleyair.org> <dave.warner@valleyair.org>
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Subject: SJV NNSR precursor demo comments

Leland / Errol / Arnaud / Dave –

Thank you for your time on our 5/9 call, we thought it was productive and positive. We appreciate your responsiveness to our concerns. (And special thanks to Leland for his efforts & for being available on travel.)

We already relayed our main comments on the call, relating to expanded narrative on selection of hypothetical source size & location, etc.; this provides more detail on a few.

Re: "Demonstration of NH3 Precursor Contribution to PM2.5 in the San Joaquin Valley" (dated April 15, 2019), in file: NNSR Modeling Demonstration Report 2019-04-15.pdf (a.k.a. Precursor Demonstration or PD)

These comments mainly concern clarification/expansion on the tables and associated narrative.

As we discussed, it would be desirable to have an expanded narrative describing the process of defining hypothetical sources listed in Table 5. That could include the relationship of tables 2 – 5 with each other.

- Was the starting point for the Table 5 hypothetical sources the large grandfathered sources in Table 2, or the recent source modifications in Tables 3 & 4, or both?
- There is an error in Table 2 (large grandfathered sources): "J R Simplot Company" has "2819" (an SIC code) in the "Emission Source" column (other facilities in the table have Turbine or Composting).
- Table 2 would be clearer if SIC and NAICS were provided, to enable comparisons with Tables 3, 4, 5.
- Table 5 (hypothetical sources) would be clearer if the meaning of the SIC (and/or NAICS) codes were provided, and the type of emitting unit(s). It appears that every "Industry" in Table 2 is represented by a "Source Description" in Table 5 (except for J R Simplot), but the correspondence is not completely clear because Table 2 does not provide SIC or NAICS codes.
- Are the stack parameters used in modeling Table 5 sources taken from the corresponding SIC rows in Table 3 (modified sources)?
- Are all industries in Table 2 represented in Table 5? Not all SIC codes in Tables 3 & 4 are reflected in Table 5. How was the Table 5 subset of source types selected (e.g., does it reflect the range of new sources that could locate in the area)?
- Do the emissions in Tables 2 and 5 represent allowable or actual emissions? Since allowable would be a more conservative estimate for size sources that potentially could locate in the area,

On the call we already discussed this some -- expanded narrative on source locations, and making the PD document stand-alone. Section 5.1.5 of the PD provides a general description of how source locations were chosen. Could you elaborate on how these factors and resources requirements were used in choosing locations, for each hypothetical source type? There is currently some source type-specific information on this for oil & gas operations in the PD starting at p.17, and about CAFs in the Protocol v2, bottom of p.8.

Thanks for considering these comments. We can certainly be available to discuss further if you wish.

Separate but related, please feel free to follow up with Laura Yannayon regarding Rule 2201.

- Scott B.

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"Scott Bohning" <bohning.scott@epa.gov>

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